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8 Attorneys for Defendants  
9 SAMSUNG SDI CO., LTD.,  
SAMSUNG SDI AMERICA, INC.,  
10 SAMSUNG SDI (MALAYSIA) SDN. BHD.,  
SAMSUNG SDI MEXICO S.A. DE C.V.,  
11 SAMSUNG SDI BRASIL LTDA.,  
SHENZHEN SAMSUNG SDI CO., LTD. and  
12 TIANJIN SAMSUNG SDI CO., LTD.

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION  
16

17 IN RE: CATHODE RAY TUBE (CRT)  
18 ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

19 This Document Relates to:

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21 *All Indirect Purchaser Actions*

22 *Sharp Electronics Corp., et al. v. Hitachi Ltd.,*  
23 *et al.*, No. 13-cv-1173;

24 *Sharp Elecs. Corp. v. Koninklijke Philips*  
25 *Elecs. N.V.*, No. 13-cv-02776;

26 *Siegel v. Hitachi, Ltd.*, No. 11-cv-05502;

27 *Siegel v. Technicolor SA, et al.*, No. 13-cv-  
28 05261;

**DECLARATION OF JAMES L.  
MCGINNIS IN SUPPORT OF SDI  
DEFENDANTS' MOTION *IN LIMINE* TO  
PROHIBIT PLAINTIFFS FROM  
CONFLATING SDI WITH NON-  
PARTIES, INCLUDING BUT NOT  
LIMITED TO SAMSUNG ELECTRONICS  
CO., LTD. [SDI'S MIL NO. 1]**

1 *Best Buy Co., et al. v. Hitachi, Ltd., et al.,*  
2 No. 11-cv-05513;

3 *Best Buy Co., et al. v. Technicolor SA, et al.,*  
4 No. 13-cv-05264;

5 *Target Corp. v. Chunghwa Picture Tubes,*  
6 *Ltd., et al.,* No. 11-cv-05514;

7 *Target Corp. v. Technicolor SA, et al.,* No. 13-  
8 cv-05686;

9 *Sears, Roebuck and Co. and Kmart Corp. v.*  
10 *Chunghwa Picture Tubes, Ltd.,* No. 11-cv-  
11 05514;

12 *Sears, Roebuck and Co. and Kmart Corp. v.*  
13 *Technicolor SA,* No. 13-cv-05262;

14 *Viewsonic Corp. v. Chunghwa Picture Tubes,*  
15 *Ltd.* No. 14-cv-02510.

16 **REDACTED VERSION OF DOCUMENT SUBMITTED UNDER SEAL**  
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1 I, James L. McGinnis, declare as follows:

2 1. I am a partner at the law firm of Sheppard Mullin Richter & Hampton LLP, counsel  
3 of record for defendants Defendants Samsung SDI America, Inc.; Samsung SDI Co., Ltd.;  
4 Samsung SDI (Malaysia) SDN. Bhd.; Samsung SDI Mexico S.A. De C.V.; Samsung SDI Brasil  
5 Ltda.; Shenzhen Samsung SDI Co., Ltd.; and Tianjin Samsung SDI Co., Ltd. (collectively, "SDI").  
6 I submit this declaration in support of SDI Defendants' Motion *In Limine* To Prohibit Plaintiffs  
7 From Conflating SDI With Non-Parties, Including But Not Limited To Samsung Electronics Co.,  
8 Ltd. ("SDI's MIL No. 1"). I have personal knowledge of the facts herein set forth and, if called as  
9 a witness, I could and would competently testify thereto.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the September  
11 26, 2014 Rebuttal Report of Alan Frankel for Plaintiff Alfred H. Siegel, as Trustee of the Circuit  
12 City Stores, Inc. Liquidating Trust.

13 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the June 30,  
14 2014 Supplemental Report of Alan Frankel for Plaintiff Alfred H. Siegel, as Trustee of the Circuit  
15 City Stores, Inc. Liquidating Trust.

16  
17 I declare under penalty of perjury under the laws of the United States of America  
18 that the foregoing is true and correct.

19 Executed this 13th day of February 2015 in San Francisco, California.

20  
21 /s/ James L. McGinnis

22 James L. McGinnis  
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# EXHIBIT 1

[SUBMITTED UNDER SEAL]

# EXHIBIT 2

[SUBMITTED UNDER SEAL]